

# **EXHIBIT A**

Approved, SCAO

Original - Court  
1st copy - Defendant2nd copy - Plaintiff  
3rd copy - Return

STATE OF MICHIGAN

JUDICIAL DISTRICT  
JUDICIAL CIRCUIT  
COUNTY30th  
Ingham

SUMMONS

CASE NUMBER

25-3143

-NO

Court telephone number  
517-483-6500

Court address

313 W. Kalamazoo St., Lansing, MI 48933

Plaintiff's name, address, and telephone number  
CHAD TEACHOUTDefendant's name, address, and telephone number  
SPEEDWAY LLCPlaintiff's attorney bar number, address, and telephone number  
Michael D. Szparaga (P80373) (517) 393-3000  
Micaela Dalrymple (P87829)  
Grewal Law PLLC  
2290 Science Pkwy., Okemos, MI 48864

**Instructions:** Check the items below that apply to you and provide any required information. Submit this form to the court clerk along with your complaint and, if necessary, a case inventory addendum (MC 21). The summons section will be completed by the court clerk.

**Domestic Relations Case**

There are no pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.

There is one or more pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint. I have separately filed a completed confidential case inventory (MC 21) listing those cases.

It is unknown if there are pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.

**Civil Case**

This is a business case in which all or part of the action includes a business or commercial dispute under MCL 600.8035.

MDHHS and a contracted health plan may have a right to recover expenses in this case. I certify that notice and a copy of the complaint will be provided to MDHHS and (if applicable) the contracted health plan in accordance with MCL 400.106(4).

There is no other pending or resolved civil action arising out of the same transaction or occurrence as alleged in the complaint.

A civil action between these parties or other parties arising out of the transaction or occurrence alleged in the complaint has

been previously filed in  this court,  \_\_\_\_\_ Court, where it was given case number \_\_\_\_\_ and assigned to Judge \_\_\_\_\_

The action  remains  is no longer pending.

**SUMMONS**

Summons section completed by court clerk.

**NOTICE TO THE DEFENDANT:** In the name of the people of the State of Michigan you are notified:

1. You are being sued.
2. **YOU HAVE 21 DAYS** after receiving this summons and a copy of the complaint to **file a written answer with the court** and serve a copy on the other party **or take other lawful action with the court** (28 days if you were served by mail or you were served outside of Michigan).
3. If you do not answer or take other action within the time allowed, judgment may be entered against you for the relief demanded in the complaint.
4. If you require accommodations to use the court because of a disability or if you require a foreign language interpreter to help you fully participate in court proceedings, please contact the court immediately to make arrangements.

Issue date <b>JUN 13 2025</b>	Expiration date* <b>SEP 12 2025</b>	Court clerk <b>SAKALA BOLLEY</b>
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\*This summons is invalid unless served on or before its expiration date. This document must be sealed by the seal of the court.

Summons (3/23)

Case Number 25- 3143 -NO

**PROOF OF SERVICE**

**TO PROCESS SERVER:** You must serve the summons and complaint and file proof of service with the court clerk before the expiration date on the summons. If you are unable to complete service, you must return this original and all copies to the court clerk.

**CERTIFICATE OF SERVICE / NONSERVICE**

I served  personally  by registered or certified mail, return receipt requested, and delivery restricted to the addressee (copy of return receipt attached) a copy of the summons and the complaint, together with the attachments listed below, on:

I have attempted to serve a copy of the summons and complaint, together with the attachments listed below, and have been unable to complete service on:

Name	Date and time of service
Place or address of service	
Attachments (if any)	

I am a sheriff, deputy sheriff, bailiff, appointed court officer or attorney for a party.

I am a legally competent adult who is not a party or an officer of a corporate party. I declare under the penalties of perjury that this certificate of service has been examined by me and that its contents are true to the best of my information, knowledge, and belief.

Service fee \$	Miles traveled	Fee \$	TOTAL FEE \$
Incorrect address fee \$	Miles traveled	Fee \$	

Signature

Name (type or print)

**ACKNOWLEDGMENT OF SERVICE**

I acknowledge that I have received service of a copy of the summons and complaint, together with

Attachments (if any) on Date and time

on behalf of \_\_\_\_\_  
Signature \_\_\_\_\_

Name (type or print) \_\_\_\_\_

STATE OF MICHIGAN  
IN THE CIRCUIT COURT FOR INGHAM COUNTY

CHAD TEACHOUT,

Plaintiff,

File No. 25- 3143 -NO  
~~ATTN: MORGAN E. COLE~~

v.

Honorable \_\_\_\_\_

SPEEDWAY LLC, a foreign limited  
liability company,

Defendant.

Michael D. Szparaga (P80373)

Micaela Dalrymple (P87829)

GREWAL LAW PLLC

Attorneys for Plaintiff

2290 Science Parkway

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517-393-3000

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Okemos, MI  
48864

There is no other pending or  
resolved civil action arising out  
of the transaction or occurrence  
alleged in the complaint.

Michael D. Szparaga (P80373)

COMPLAINT

**NOW COMES** Plaintiff Chad Teachout ("Plaintiff"), by and through his attorneys, GREWAL LAW, PLLC, and for the General Allegations of his Complaint, states as follows:

PARTIES, JURISDICTION, AND VENUE

1. Plaintiff, at all times relevant herein, was a resident of Lansing, County of Ingham, State of Michigan.

2. Defendant Speedway LLC ("Defendant") is a Delaware foreign limited liability company authorized and licensed to do business in Ingham County, Michigan.
3. Defendant owns and operates Speedway located at 6825 S. Cedar St., Lansing, County of Ingham, State of Michigan.
4. The incident that is the subject matter of this lawsuit occurred in Ingham County, Michigan.
5. Venue is proper in the County of Ingham, State of Michigan, per MCL 600.1629.
6. This Honorable Court has jurisdiction over Defendant in this action per MCL 600.711.
7. The amount in controversy is in excess of Twenty-Five Thousand (\$25,000.00) Dollars, exclusive of interest, costs, and attorney fees.

#### GENERAL FACTUAL ALLEGATIONS

8. Plaintiff incorporates the preceding paragraphs by reference as if fully set forth herein.
9. On or about November 9, 2024, Plaintiff lawfully visited Defendant's Speedway located at 6825 S. Cedar Street, Lansing, Michigan 48911 (hereinafter "Premises").
10. Plaintiff parked his vehicle in the Premises parking lot and began to head towards the storefront located on the Premises to purchase a fountain drink.
11. Upon Plaintiff's casual inspection and the use of ordinary care, the paved surfaces on the Premises appeared safe to travel without any noticeable dangers or hazards.

  
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12. As Plaintiff traversed the area of Premises located near the storefront entrance, he unexpectedly encountered a large hole in the paved surface abutting the curb.
13. As a result, Plaintiff rolled his right ankle, immediately causing significant pain.
14. Plaintiff reported this incident to Defendant's employees and/or agents at the Premises, and, upon information and belief, no incident report was generated.

**COUNT I – PREMISES LIABILITY**

15. Plaintiff incorporates the preceding paragraphs by reference as if fully set forth herein.
16. At the time of the above-stated incident, Plaintiff was a business invitee of Defendant, invited to enter and remain on the Premises for a commercial benefit to Defendant.
17. Defendant owed a duty of ordinary care to Plaintiff, and a higher duty to Plaintiff as a business invitee.
18. As the entity that owned, managed, operated, and/or controlled the Premises, Defendant had a duty to exercise ordinary care to keep the Premises in reasonably safe condition for invitees such as and including Plaintiff.
19. Defendant owed a duty to Plaintiff and other invitees to take reasonable measures within a reasonable amount of time to discover and reduce or diminish hazards on its Premises.
20. Defendant knew, or in the exercise of ordinary care should have known, of the dangerous condition present on the Premises, specifically the presence of a large hole in the pavement near the storefront entrance.



21. Defendant knew or should have known that the condition of the Premises involved an unreasonable risk of harm to invitees, including Plaintiff.
22. The dangerous condition of the hole in the pavement existed for a sufficient length of time that Defendant discovered the condition, or in the exercise of due care, should have discovered the condition.
23. Defendant breached its duty by failing to:
  - a. Inspect the Premises for hazards; and/or
  - b. Warn Plaintiff of the hazard; and/or
  - c. Discover the hazard; and/or
  - d. Maintain its Premises in reasonably safe condition; and/or
  - e. Take reasonable remedial measures; and/or
  - f. Any other negligent act or omission subsequently determined.
24. Any negligence on the part of Defendant's employees, servants, and/or agents is imputed to and becomes the negligence of Defendant through the doctrines of agency and *respondeat superior*.
25. As a direct and proximate result of the negligent acts of Defendant, Plaintiff sustained injuries including, but not limited to: (1) non-displaced fracture of right distal tibia; (2) lateral soft tissue swelling; (3) significant bruising and discoloration; (4) right lower extremity pain and tenderness; (5) osteochondral defect in medial aspect of talar dome; (6) osseous densities adjacent to tip of right lateral malleolus; (7) past, present, and future pain and suffering as a direct and proximate result of the injuries sustained; (8) past, present, and future medical treatment; (9) psychological harm and injury; and (10) mental pain and anxiety.



26. As a further direct and proximate result of the actions and omissions of Defendant, Plaintiff has suffered and continues to suffer pain, disability, mental anguish, medical expenses, and other damages that will be discovered during the course of litigation.

**WHEREFORE**, Plaintiff Chad Teachout makes a claim for all non-economic losses and any economic losses this Honorable Court deems just in excess of Twenty-Five Thousand Dollars (\$25,000.00). Further, Plaintiff makes a claim for any amount to which he may be entitled, plus costs, fees, interest, and costs to be taxed, and for whatever amount this Honorable Court may deem just and proper and the nature of this case may allow.

Respectfully Submitted,

**GREWAL LAW, PLLC**



Michael D. Szparaga (P80373)  
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517-393-3000  
[mszparaga@4grewal.com](mailto:mszparaga@4grewal.com)

Dated: June 13, 2025



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STATE OF MICHIGAN  
IN THE CIRCUIT COURT FOR INGHAM COUNTY

CHAD TEACHOUT,

Plaintiff,

File No. 25- 3143 -NO  
HON. JUDGE MORGAN E. COLE

v.

SPEEDWAY LLC, a foreign limited  
liability company,

Defendant.

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[mdalrymple@4grewal.com](mailto:mdalrymple@4grewal.com)

**JURY DEMAND**

**NOW COMES** Plaintiff, Chad Teachout, by and through his attorneys, GREWAL LAW PLLC, and hereby demands a trial by jury in reference to the above-entitled matter.

Respectfully Submitted,

**GREWAL LAW, PLLC**



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Dated: June 13, 2025